

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas  
*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,  
Inc., Planned Parenthood Gulf Coast, Inc.,  
Planned Parenthood of Greater Texas, Inc.,  
Planned Parenthood South Texas, Inc.,  
Planned Parenthood Cameron County, Inc.,  
Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

**DECLARATION OF POLIN BARRAZA**

I, Polin Barraza, declare and state as follows:

1. I am currently employed by Planned Parenthood South Texas, Inc. (“PPST”) as Senior Vice President and Chief Operating Officer. I have been the Chief Operating Officer since 2013. From 2010 to 2012, I was Senior Vice President-Healthcare & Compliance. I also currently volunteer at PPST subsidiaries Planned Parenthood San Antonio, Inc. (“PPSA”) as President and Board Chair, a position I have held since 2019, and Planned Parenthood Cameron County, Inc. (“PPCC”) as President, a position I have served in since 2020. I refer to PPST, PPSA, and PPCC collectively as “PPST” in this declaration. I am over the age of 18 and have personal knowledge of the matters herein or have acquired such knowledge by personally examining business records

kept in the ordinary course of PPST's business. If called upon to testify, I could and would testify thereto.

2. I make this declaration in support of Defendants' Opposition to Relator's Motion to Unseal Memorandum and Appendix in Support of Motion for Summary Judgment. I understand that the Relator is attempting to unseal Plaintiffs' brief and 13-volume, 6,295 page appendix, and that some of the documents in Plaintiffs' appendix were designated by PPST as "Confidential" or "Confidential Attorneys' Eyes Only" under the Protective Order entered in this matter. Unsealing these materials would substantially and materially harm PPST and others by disclosing trade-secret level, non-public information.

3. PPST is a healthcare provider, and competes with other healthcare organizations for medical professionals and patients in the market place. As a 501(c)(3) non-profit organization, PPST is also reliant on securing donations and other grants to fund its mission of providing high-quality reproductive healthcare to its patients in Texas. In that context, PPST is competing with similarly situated organizations to secure access to donations and grants. In addition, PPST's mission elicits strong opposition actors who have conducted acts against PPST that range from harassing business and mission partners to acts of violence.

4. The documents Relator is seeking to unseal were designated as "Confidential" or "Confidential Attorneys' Eyes Only Information" because they include non-party commercial information, detailed accreditation reports, trade secret and proprietary information, or information regarding grants PPST has received.

5. Non-Party Financial and Commercial Information. The document in this category contain non-party board minutes, bylaws, and financial reports of a non-party for-profit corporation and its subsidiaries. *See* APPX.004222-APPX.004385. This document is not cited in

the brief and contains sensitive financial and commercial information of a non-party holding company and its subsidiaries with which PPST transacts business. Disclosure of this information may expose PPST's business partner to increased harassment, the risk of personal harm to the individuals identified, and potential financial harms.

6. Detailed Accreditation Reports. The documents in this category contain accreditation reports and corrective action reports for PPST. *See, e.g.,* APPX.003356-APPX.003446. The accreditation reports contain detailed information about all aspects of PPST's performance and operations, including information related to PPST's security measures, the volume and variety of medical services PPST provides, PPST's detailed financial information and accounting practices, fundraising strategy, strategic and programing priorities, staffing and human resources priorities, and any corrective actions taken by PPST. This information is highly sensitive and impacts every aspect of PPST's operations. Disclosure of confidential security measures that PPST has taken could lead to physical harm or harassment of employees and patients if those security measures, once public, are circumvented. Disclosures of financial information and fundraising strategy could affect donations, causing financial harm to PPST. Disclosures of this information could also cause financial harm to PPST if obtained by its healthcare provider competitors and could disrupt current systems and affect PPST's ability to provide patient care. Disclosure of certain strategic material could also harm PPST's ability to recruit and retain medical staff for its healthcare centers, causing financial and competitive harm. Disclosures of corrective actions needed, even from years previous, may be used by healthcare provider competitors to question the quality of PPST's care, causing financial and competitive harm.

7. Trade Secret and Proprietary Information. The documents in this category include a report to PPST board members on PPST operations, *see* APPX.005220-APPX.005285, and a

PPFA white paper related to PPFA proprietary information, *see* APPX.005289-APPX.005303. The report to PPST's board contains sensitive business risk and compliance information, as well as names of non-public facing PPST employees. Disclosure of this information could lead to financial harm to PPST if obtained by its healthcare provider competitors and could disrupt current systems and affect PPST's ability to provide patient care. Disclosure of non-publicly identified PPST employees' names could lead to physical harm or harassment of the individuals named. The PPFA white paper includes PPFA's trade secret level, non-public information surrounding the business strategy of potential licensing of proprietary information.

8. Financial and Grant Information. The documents listed in this category contains proprietary information and propriety financial information about grants provided to PPST. *See, e.g.,* APPX.004127-APPX.004130. The information contained in the documents is not information that PPST releases to the public during the regular course of business. Disclosure of this financial information could cause PPST financial and competitive harm if obtained by the general public or by any of PPST's healthcare provider competitors, as it would reveal information about PPST's revenues.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on February 8, 2023 in San Antonio, Texas.



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Polin Barraza